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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

MICHAEL WILLIAMS,

TO BE FILED UNDER SEAL

**AFFIDAVIT IN SUPPORT
OF ARREST WARRANT**

(18 U.S.C. §§ 1512(b)(1), 844(i), 2
and 3551 et seq.)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

SYLVETTE REYNOSO, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about June 11, 2020, within the Eastern District of New York and elsewhere, the defendant MICHAEL WILLIAMS, together with others, did knowingly and intentionally use intimidation and threaten and attempt to use intimidation, threaten and corruptly persuade another person, to wit: Jane Doe, an individual whose identity is known to the Affiant, and engage in misleading conduct toward Jane Doe, with intent to influence, delay and prevent the testimony of Jane Doe in an official proceeding, to wit: United States v. Robert Sylvester Kelly, Criminal Docket No. 19-286 (AMD).

(Title 18, United States Code, Sections 1512(b)(1), 2 and 3551 et seq.)

On or about June 11, 2020, within the Southern District of Florida, the defendant MICHAEL WILLIAMS, together with others, did knowingly, intentionally and

maliciously damage and destroy by means of fire and an explosive a vehicle used in interstate and foreign commerce and in an activity used in interstate and foreign commerce.

(Title 18, United States Code, Sections 844(i), 2 and 3551 et seq.)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), and have been since 2008. I am currently assigned to HSI’s New York Field Office and, more specifically, to a squad that investigates human trafficking and alien smuggling matters. Previously, I was assigned to narcotics and counter-proliferation squads. I am responsible for conducting and assisting in investigations into the activities of individuals and criminal groups responsible for sex and human trafficking and related offenses. In that capacity, I have participated in investigations involving the debriefing of sex trafficking and sex abuse victims, review of telephone records, cell site location and GPS data, review of money transfer records, surveillance, analysis of pen register information, and the execution of search warrants, including the execution of search warrants on computers and other electronic media. As a result of my training and experience, I am familiar with the techniques and methods of operation used by individuals involved in criminal activity to conceal their activities from detection by law enforcement authorities.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. The U.S. Attorney's Office for the Eastern District of New York and HSI's New York Field Office are investigating Robert Sylvester Kelly, also known as "R. Kelly," and others for their participation in a racketeering enterprise involving bribery, extortion, the production of child pornography; transportation of women and girls across state lines to engage in illegal sexual activity, including sexual contact with individuals who were too young to consent to such activity under state law and failure to notify sexual partners of a sexually transmitted disease prior to engaging in sexual intercourse in violation of state law, and related substantive offenses; and for arranging for travel in interstate commerce with intent to promote, manage, establish, and carry on an extortion, in violation of state law.

3. On June 20, 2019, a grand jury in the Eastern District of New York returned an indictment charging Kelly with racketeering involving predicate racketeering acts as to five different women and four Mann Act violations. See United States v. Robert Sylvester Kelly, Criminal Docket No. 19-286 (AMD) (E.D.N.Y.). On July 10, 2019, the grand jury returned a superseding indictment, which added a forfeiture allegation. On December 5, 2019, the grand jury returned a second superseding indictment, adding an additional predicate act of bribery. On March 12, 2020, the grand jury returned a third superseding indictment (the "Indictment") against Kelly. Among the charges against Kelly in the Indictment were offenses that carried a ten-year mandatory minimum sentence based on Kelly's sexual relationship with Jane Doe, an individual whose identity is known to the Affiant.

4. There is probable cause to believe that as of June 11, 2020, the defendant MICHAEL WILLIAMS was aware of the federal investigation of Robert Kelly.

On or about December 20, 2019, WILLIAMS accompanied an individual whose identity is known to the Affiant (“I-1”) to a voluntary interview with federal agents, including the Affiant; WILLIAMS himself was not interviewed and did not attend the interview with I-1. Moreover, in May 2020, WILLIAMS, using a Google account associated with one of WILLIAMS’ Gmail addresses, viewed one or more articles about the federal charges that Kelly is currently facing.

5. In or about January 2020, Jane Doe began cooperating with federal law enforcement. Several news outlets thereafter reported that Jane Doe was cooperating with federal law enforcement.

6. Jane Doe’s father (the “Father”) provided to law enforcement screenshots of text messages that he indicated were between the Father and I-1. The text messages document a combative relationship between the Father and I-1, and in several of the messages, they accused the other of slandering him/her. The screenshots also include a text message purportedly from I-1 that warns the Father:

it might be wise for you to protect your daughter from heartache she's gonna endure through this and after. She had to live with every stain you guys create publicly. Getting angry and lashing out on live making threats or having her drop videos taking jobs honestly doesn't look good. It's just igniting an ignorant fight that should've never started to begin with. I know you don't care but even media personalities and production who were rooting for [nickname for Jane Doe] are starting to say they view her different based on her actions and words. So even in the event of the 'truth' you say is coming being exposed, it still won't have anything to do with how they view your daughter. Y'all may want to think about that because right now you got her out here looking crazy honestly.

Based on my participation in this investigation, I know that Jane Doe has maintained a presence on social media, including on Instagram Live and by posting videos on social

media, in which she publicly has discussed how Kelly physically and mentally abused her during their relationship.

7. On June 11, 2020, at approximately 2:50 a.m. Eastern Time, a black SUV (the “Vehicle”), which had been leased from Enterprise Rent-A-Car (“Enterprise”), a commercial vehicle rental establishment, and which was parked outside of the residence in Florida where Jane Doe was staying (the “Residence”), was set on fire in an apparent arson. The Vehicle sustained substantial damage as the result of the arson. Inside of the Residence at the time of the arson were four adults and two minors. One of the adults reported to law enforcement, in part and in substance, that upon hearing an explosion, s/he ran outside of the Residence and saw an individual fleeing from the scene of the fire, whose arm appeared to be lit on fire. Fire investigators also determined that an accelerant was present along some or all of the outside perimeter of the Residence.

8. A surveillance camera, positioned at a residence along a street immediately parallel to the Residence, showed a vehicle traveling at a high rate of speed at approximately 2:53 a.m. While the footage is grainy, a detective with the New York City Auto Crime Division advised that the vehicle in the footage is consistent with a GMC Yukon.

9. The SUV was rented in Florida by the father of Jane Doe from Enterprise, a business that operates in interstate commerce and whose headquarters is located outside of Florida (and New York).

10. On June 15, 2020, the Honorable Ramon E. Reyes, Jr., United States Magistrate Judge for the Eastern District of New York, authorized a search warrant to Google for users who had conducted a search of the address of the Residence close in time to

the arson. Among the individuals who searched the address was an individual using IP addresses 2600:1005:b04e:2982:14e7:9a5:1fc1:4978 and 2600:1006:b157:d7b1:5148:9202:ba0a:7ceb (the “IP Addresses”) on June 10, 2020, at 10:29 p.m. Eastern Time; June 11, 2020, at 12:59 a.m. Eastern Time and June 11, 2020, at 1:04 a.m. Eastern Time. (The arson took place at approximately 2:50 a.m. Eastern Time on June 11, 2020). Verizon Wireless records show that the IP Addresses at those particular times belonged to telephone number known to the affiant with a 786 area code and ending in 8432 (the “8432 Telephone”), which is subscribed to by Michael Williams at an address in Valdosta, Georgia (the “Valdosta Residence”). Google records showed that the individual who conducted the search of the address of the Residence used Google Account ID 69478315150, which listed “Michael Williams” as the name of the user of the account, mw03111983@gmail.com as an email address for the account and the 8432 Telephone as the “recovery SMS.”² According to Google records, the mw03111983@gmail.com account was created on May 27, 2020.

11. The defendant MICHAEL WILLIAMS is a family member of I-1. I-1 once served as a publicist for Kelly.

12. On June 11, 2020, the Honorable Roanne L. Mann, United States Magistrate Judge for the Eastern District of New York, authorized a search warrant on various telephone companies that operated cell towers serving the Residence. The results of

² Michael Williams’ date of birth is March 11, 1983 (i.e., 03/11/1983 – the number sequence after “mw” in mw03111983@gmail.com).

that search warrant showed that among the telephone numbers that were served by those cell towers on June 11, 2020, between 2:00 a.m. and 3:30 a.m. was the 8432 Telephone.

13. On July 3, 2020, the Honorable James Orenstein, United States Magistrate Judge for the Eastern District of New York, authorized a search warrant on Verizon Wireless for historical location information associated with the 8432 Telephone. Verizon Wireless records show that the 8432 Telephone traveled from the vicinity of Valdosta, Georgia (where the defendant MICHAEL WILLIAMS resides and where the 8432 Telephone was on June 10, 2020, at 7:40 p.m.), to the vicinity of Kissimmee, Florida (where the Residence is located),³ to the vicinity of Lake City, Florida (where the 8432 Telephone was on June 11, 2020, at 5:31 a.m.), and finally back to the vicinity of Valdosta, Georgia (where the 8432 Telephone was on June 11, 2020, at 2:09 p.m.).

14. As detailed in this paragraph, there is probable cause to believe that the defendant MICHAEL WILLIAMS uses a second telephone number known to the affiant with a 229 area code and ending in 8231 (the “8231 Telephone”), in addition to the 8432 Telephone, and a second email address, in addition to mw03111983@gmail.com. Specifically, in or about 2015, the defendant MICHAEL WILLIAMS submitted an application for a United States passport, on which he listed his email address as mikewill437@gmail.com. Google records indicate that the 8231 Telephone is listed as the recovery telephone number for the mikewill437@gmail.com email account. The 8231 Telephone is also subscribed to by “Michael Williams.” Moreover, a review of telephone

³ The 8432 Telephone placed two telephone calls at 3:31 a.m. During the first call, the 8432 Telephone was in the vicinity of Kissimmee, Florida. During the second telephone call, the 8432 Telephone was in the vicinity of Winter Garden, Florida (approximately 30 miles north of Kissimmee, Florida).

records for the 8231 Telephone shows regular communications between a telephone known to be used by I-1 and the 8231 Telephone, including on June 11, 2020, at 12:44 a.m. (approximately two hours and six minutes before the above-described arson), when I-1 placed a telephone call to the 8231 Telephone and the call lasted approximately 193 seconds.

15. A 2003 GMC Yukon with Georgia license plate XMC-789 and Vehicle Identification Number 1GKEK13Z83R115627 is registered to another individual (“I-2”) at the Valdosta Residence. Law enforcement agents have conducted physical surveillance in the vicinity of the Valdosta Residence and have observed a white GMC Yukon (the “WILLIAMS GMC YUKON”) with no front license plate in the driveway next to the Valdosta Residence as recently as August 3, 2020. Law enforcement agents were unable to view the back of the WILLIAMS GMC YUKON to observe the back license plate, but took photographs of the WILLIAMS GMC YUKON that depict distinct damage to the front and side of the WILLIAMS GMC YUKON. Records from the Florida Department of Transportation, which include photographs, indicate that (i) at approximately 1:09 a.m. Eastern Time on June 11, 2020 (approximately an hour and 41 minutes before the arson described above), a GMC Yukon with no front license plate and with the same distinct damage to the front and side as the WILLIAMS GMC YUKON traveled Southbound through the Leesburg Toll Plaza North exit ramp for US-27 on the Florida Turnpike, (ii) at approximately 3:34 a.m. Eastern Time on June 11, 2020 (approximately 44 minutes after the arson described above), a GMC Yukon with no front license plate and with the same distinct damage to the front and side as the WILLIAMS GMC YUKON traveled Northbound through the Western Beltway Mainline Toll Plaza on the Florida Turnpike, and (iii) at approximately 4:06 a.m. Eastern Time on June 11, 2020 (approximately one hour and 16

minutes after the arson described above), a GMC Yukon with no front license plate and with the same distinct damage to the front and side as the WILLIAMS GMC YUKON traveled Northbound through the Leesburg Mainline Toll Plaza on the Florida Turnpike.⁴ Notably, the GMC Yukon that traveled through the tolls at approximately 1:09 a.m., 3:34 a.m. and 4:06 a.m. also appears to have had no visible rear license plate at the time based on (1) a review of photographs of the rear of the vehicle as it traveled through the tolls and (2) the fact that the records indicate that the vehicle did not pay the tolls and was thus designated as a “violator.” (Significantly, a license plate reader in Georgia captured the WILLIAMS GMC YUKON in Hahira, Georgia, on June 10, 2020 at 7:25 p.m. Eastern Time with its rear license plate clearly visible, strongly suggesting that WILLIAMS removed the real license plate before he traveled to the Residence in an attempt to avoid detection by law enforcement.) According to Google Maps, depending on the route taken, the Leesburg Toll Plazas are approximately 60.6 to 72.5 miles from the Residence where the arson occurred; the Western Beltway Mainline Toll Plaza is approximately 26.8 to 31.4 miles from the Residence where the arson occurred.

16. The photograph of the front of the GMC Yukon that traveled through the Leesburg Mainline Toll Plaza at approximately 4:06 a.m. shows what appears to be a male individual in the driver’s seat.

17. On July 29, 2020, the Honorable Robert M. Levy authorized a search warrant of the Google accounts associated with mikewill437@gmail.com and

⁴ The photographs are black and white photographs. The GMC Yukon appears to be white in the photographs.

mw03111983@gmail.com, both of which, as described above, appear to be used and controlled by the defendant MICHAEL WILLIAMS. Execution of the search warrant on the Google accounts revealed the following:⁵

- a. WILLIAMS, using mikewill437@gmail.com and mw03111983@gmail.com accounts, searched the address of the Residence on multiple occasions, with the first search on April 10, 2020 and the most recent search on June 15, 2020 (four days after the date of the arson).
- b. On April 14, 2020, WILLIAMS, using the mikewill437@gmail.com account, conducted a search for “can you drive in Florida without a tag as long as you have insurance on your car”;
- c. On April 17, 2020, WILLIAMS, using the mikewill437@gmail.com account, conducted a search for “where can i buy a .50 custom machine gun”;
- d. In May 2020, WILLIAMS, using the mikewill437@gmail.com account, viewed multiple YouTube videos about Jane Doe;
- e. On May 23, 2020 and May 25, 2020, WILLIAMS, using the mikewill437@gmail.com account, visited several websites about female individuals who had made allegations against Kelly. He also searched “surviving r kelly news” and “r kelly news.”

⁵ The dates and times provided in the Google records is in Universal Coordinated Time (UTC). The dates set forth below are based on a conversion from UTC to Eastern Time.

- f. On June 7, 2020 and June 9, 2020, WILLIAMS, using the mw03111983@gmail.com account, conducted a search for “countries that don't have extradition with the united states”;
- g. On June 21, 2020, WILLIAMS, using the mikewill43@gmail.com account, conducted a search for “fertilizer and diesel fuel” and subsequently visited websites titled “How Do Fertilizer Bombs Work?”; “Detonation Properties of Mixtures of Ammonium Nitrate Based Fertilizers and Fuels” and “Why fertilizer can be an explosive mixture”;
- h. On June 28, 2020, WILLIAMS, using the mikewill437@gmail.com account, conducted a search for “witness intimidation” and “case law for tampering with a witness,” and visited websites laying out the statutory language and penalties of Title 18, United States Code, Sections 1512 and 1513.
- i. On July 9, 2020, WILLIAMS, using the mikewill437@gmail.com account, visited websites that contained the statutory language for Title 18, United States Code, Sections 2423 (transportation of minors), 2422 (coercion and enticement), 2421A (promotion or facilitation of prostitution) and 1962 (racketeering). Based on my participation in this investigation, there is probable cause to believe that WILLIAMS was attempting to review each of the statutes with which Kelly is currently charged.⁶

⁶ Kelly is charged with a violation of Section 2421 not Section 2421A.

18. Because public filing of this document could result in a risk of flight by the defendant, as well as jeopardize the government's investigation, your deponent respectfully requests that the complaint and arrest warrant be filed under seal.

WHEREFORE, your deponent respectfully requests that the defendant MICHAEL WILLIAMS be dealt with according to law.



SYLVETTE REYNOSO
Special Agent, United States Department of
Homeland Security, Homeland Security
Investigations

Sworn to before me by telephone this
4 day of August, 2020

Steven M. Gold

THE HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK